

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
)
V.) **CASE NO: 2:07-cr-137-MHT-TFM**
)
SASHAY L. THOMAS)

MOTION TO CONTINUE

NOW COMES the Defendant, by and through the undersigned counsel, Christine A. Freeman, and pursuant to 18 U.S.C. § 3161, and respectfully moves this Court to move this matter from the September 17, 2007 trial docket.

In support of this Motion, defendant would show:

1. This indictment was filed against Ms. Thomas on July 18, 2007, for theft based on insufficient funds checks presented in April 2007, at a base exchange store, for a total amount of approximately \$3,149. Some or all of the items purchased with these checks were retrieved by law enforcement prior to the filing of the indictment.

2. Ms. Thomas is a U.S. military veteran and mother of three children under 5 years of age. She has no prior criminal record. She was arrested and arraigned on this matter on July 26, 2007.

3. A continuance of the September trial date is necessary to allow adequate time to pursue a pretrial diversion request. Counsel anticipates that such a request will be completed and submitted to the United States Attorney by August 28.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Jerusha Adams, Esquire
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104

Respectfully submitted,

s/Christine A. Freeman
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